



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

June 30, 2017

Mr. Craig Brymer
Regulatory Compliance Coordinator
Athens Utility Board
P.O. Box 689
Athens, TN 37371

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 9414 7266 9904 2096 0233 71

Re: Pretreatment Audit Inspection
Athens Pretreatment Program
NPDES Permit No. TN0024201
McMinn County

Dear Mr. Brymer:

The Division of Water Resources (Division) appreciates your time on March 16, 2017, when Ms. Jessica Rader and I met with you to conduct a Pretreatment Audit Inspection of Athens' industrial pretreatment program. The comments below are based on the results of the inspection.

1. During the inspection, handling of confidential information and requests by the public to review files was discussed. Plans for handling confidential information and public requests to view files should be developed in case the need arises. We recommend checking with AUB to see if procedures for handling confidential information and public requests to review files are currently available.
2. Oversight inspections were conducted at Mills Products and Thomas & Betts as part of the audit.
 - a. At Mills Products, multiple chemical drums were observed in close proximity to a drain that flows to the sewer. The drums did not have secondary containment in place. Please take appropriate steps to ensure proper secondary containment is in place to prevent spills or slug loading.
 - b. Thomas & Betts replaced their pretreatment system in 2016. The new system was observed during the oversight inspection at the facility, and the industry was commended for updating their treatment processes.

3. During the audit, the industrial user files and permits for Mills Products and Thomas & Betts were reviewed. The permits indicate that both users are categorical industrial users (CIUs) subject to the metal finishing pretreatment standards. However, the permits do not indicate whether each user is a new or existing source metal finisher. The permits should be revised to specify the new or existing source classification.

Overall, AUB appears to have an excellent pretreatment program. The files were very well organized, and you appear to have a good working relationship with the industries. We appreciate the cooperation and hospitality shown during the inspection. Please provide to this office, by August 4, 2017, a written description of the actions Athens will take to address these comments. If you have any questions, please do not hesitate to contact me at (615) 532-8786 or Laurel.Rognstad@tn.gov.

Sincerely,



Laurel Rognstad
State Pretreatment Coordinator
Compliance and Enforcement Unit

cc: Ms. Jessica Rader – Division of Water Resources, Chattanooga EFO